

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TZEW HOLDCO LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 20-10910 (CSS)
)
) (Jointly Administered)
)

**NOTICE OF AGENDA FOR TELEPHONIC HEARING SCHEDULED FOR APRIL 24,
2020 AT 1:00 P.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE
CHRISTOPHER S. SONTCHI BANKRUPTCY JUDGE, AT THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED
AT 824 NORTH MARKET STREET, 5th FLOOR, COURTROOM NO. 6,
WILMINGTON, DELAWARE 19801**

**ANY PARTY WISHING TO PARTICIPATE IN THE HEARING
MUST APPEAR THROUGH BOTH COURTCALL AND ZOOM.**

**TO APPEAR BY VIDEO CONFERENCE VIA ZOOM,
PARTIES SHOULD USE THE FOLLOWING INSTRUCTIONS:**

Join Zoom Hearing: <https://uchicago.zoom.us/j/745010319>

Meeting ID: 745 010 319

**TO APPEAR TELEPHONICALLY VIA COURTCALL, PARTIES MUST MAKE PRIOR
ARRANGEMENTS WITH COURTCALL BY
TELEPHONE (866-582-6878) OR FACSIMILE (866-533-2946)**

MATTER GOING FORWARD:

1. Debtors' Motion Seeking Entry of Orders (I)(A) Approving Bidding Procedures, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Establishing Procedures for the Assumption and Assignment of Contracts and Leases, (II)(A) Approving Asset Purchase Agreement Among the Debtors and the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Apex Parks Group, LLC (5579); Apex Real Property Holdings, LLC (1013); Speedzone Beverage Company, LLC (2339); Speedzone Holdings, LLC (7913); Speedzone Management, LLC (2937); TZEW Holdco LLC (0252); and TZEW Intermediate Corp. (1058). The location of the Debtors' service address in these chapter 11 cases is: 18575 Jamboree Road, Suite 600, Irvine, CA 92612.

Purchaser, (B) Approving Sale of Substantially All Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections 105, 363(b), (f) and (m), (C) Approving Assumption, Assignment and Sale of Certain Executory Contracts and Unexpired Leases Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections 363 and 365, and (D) Determining the Amounts Necessary to Cure Such Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Filed: 4/13/20] ([Docket No. 27](#)).

Response Deadline: April 22, 2020, at 10:00 a.m.

Committee Response Deadline: Responses can be made at the hearing.

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- a. [Proposed] Order (A) Approving Bidding Procedures, (B) Scheduling an Auction and a Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Establishing Notice and Procedures for the Assumption Assignment and Sale of Contracts and Leases, and (E) Granting Related Relief [Filed: 4/13/20] ([Docket No. 27, Exhibit A](#))
- b. [Signed] Order Granting Motion to Shorten Notice and Request for Hearing with Respect to Debtors' Motion Seeking Entry of Orders (I)(A) Approving Bidding Procedures, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Establishing Procedures for the Assumption and Assignment of Contracts and Leases, (II)(A) Approving Asset Purchase Agreement Among the Debtors and the Purchaser, (B) Approving Sale of Substantially All Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections 105, 363(b), (f) and (m), (C) Approving Assumption, Assignment and Sale of Certain Executory Contracts and Unexpired Leases Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections 363 and 365, and (D) Determining the Amounts Necessary to Cure Such Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Filed: 4/14/20] ([Docket No. 58](#)).
- c. Notice of Hearing Regarding Debtors' Motion Seeking Entry of Orders (I)(A) Approving Bidding Procedures, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Establishing Procedures for the Assumption and Assignment of Contracts and Leases, (II)(A) Approving Asset Purchase Agreement Among the Debtors and the Purchaser, (B) Approving Sale of Substantially All Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections 105, 363(b), (f) and (m), (C) Approving Assumption, Assignment and Sale of Certain Executory Contracts and Unexpired Leases Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections

363 and 365, and (D) Determining the Amounts Necessary to Cure Such Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Filed: 4/15/20] ([Docket No. 62](#)).

Status: This matter will go forward to consider the relief requested in the sale motion related to the bidding procedures.

Dated: April 22, 2020

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Timothy P. Cairns

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Proposed Counsel to the Debtors and Debtors in Possession